

June 3, 2019

VIA ELECTRONIC FILING

Honorable Ajit Pai, Chairman
Honorable Michael O’Rielly, Commissioner
Honorable Brendan Carr, Commissioner
Honorable Jessica Rosenworcel, Commissioner
Honorable Geoffrey Starks, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Reference: WT Docket No. 17-200, In the Matter of Review of the Commission’s Rules Governing the 896-901/935-940 MHz Band

Dear Chairman Pai and Commissioners O’Rielly, Carr, Rosenworcel and Starks:

The New York Power Authority (“NYPA”) is pleased to submit the following comments in response to the Notice of Proposed Rulemaking in the above captioned matter. NYPA, a public authority and political subdivision of the State of New York, is the nation’s largest state public power organization. It operates sixteen generating facilities and 1,400 circuit miles of transmission lines in the State of New York. More than seventy percent of the power that NYPA produces is clean, renewable hydropower. NYPA’s power sales support the operations of numerous government entities, and over 407,000 private-sector jobs, throughout New York State. NYPA relies heavily on wireless communications to conduct its operations.

NYPA supports the re-alignment of the 900 MHz band for broadband services for the purpose of facilitating the development of broadband technologies and services for critical infrastructure.

The proposal of pdvWireless, Inc. and the Enterprise Wireless Alliance, and the Commission’s Notice of Proposed Rulemaking, if implemented, would provide NYPA with a secure, licensed spectrum to support its efforts to help modernize the electric grid in New York State.

Specifically, such a realignment would support NYPA’s efforts to enhance its operational and programmatic capabilities and leverage the benefits of evolving innovation in wireless equipment, particularly in the following areas:

1. Drone technology to safely monitor and inspect NYPA generation and transmission assets
2. Workforce mobility applications
3. Deep metering services and analytics of our customer energy consumption
4. Wi-Fi telephony and Push-to-Talk (PTT) applications
5. Secure communications for emergency management and service restoration
6. Internet of Things (IoT) applications
7. Data transport to support NYPA energy efficiency initiatives

In summary, NYPA supports a realignment of the 900 MHz broadband channels to provide utilities with a secure, reliable and scalable private LTE broadband network, and respectfully urges the

Commission to move expeditiously to facilitate the retuning and clearing of this band so that the potential benefits of this broadband option become available to NYPA and similarly situated entities.

Sincerely,


Daniella Piper (Jul 2, 2019)

Daniella Piper
VP Digital Transformation Office & Chief of Staff
New York Power Authority

Signature: 
Daniella Piper (Jul 2, 2019)

Email: daniella.piper@nypa.gov

Title: VP Digital Transformation & Chief of Staff

Company: New York Power Authority